

REMARKS

The Applicant respectfully requests reconsideration in view of the following remarks and amendments. Claims 1 and 22 are amended. Accordingly, claims 1-20 and 22 are pending in the application.

I. Election of Claims

The Applicant notes the Examiner acknowledgment of the election of claims 1-20 and 22 without traverse in the response file on September 13, 2007.

II. Claims Rejected Under 35 U.S.C. § 103

Claims 1-20 and 22 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent Publication No. 2002/0169760 filed by Cheung et al. (hereinafter “Cheung”) in view of U.S. Patent Publication No. 2004/0093327 filed by Anderson et al. (hereinafter “Anderson”).

Claim 1, as amended, recites the elements of “identifying the target objects includes searching for the target objects located in an electronic catalog separate from the electronic storefront Web site.” Support for the amendments may be found, for example, in Fig. 1 and paragraphs [0042], [0044], [0051], and [0053] of the Specification. Cheung fails to teach or suggest these elements. In contrast, Cheung discloses the use of meta-tags in web pages. See Cheung, paragraph [0010]. Meta-tags (also synonymously called meta elements) are commonly known to be *inserted into web pages* but are often *not directly visible* to a user visiting the web site. See e.g., “Meta element.” Wikipedia: The Free Encyclopedia. 6 March 2008 <http://en.wikipedia.org/wiki/Meta_element#Meta_element_use_in_search_engine_optimization>. Cheung supports this conclusion by stating, “search engines . . . generally rely on invisible web site descriptions, or 'meta tags.’” Therefore, to generate search results based on user-inputted keyword search terms, search engines are first required to parse web pages and locate the embedded meta-tags. Id. Based on the embedded meta-tags, the search engine may associate a respective web page with a user-inputted keyword search term. Id. In other words, Cheung relies upon meta-tags located in web pages and, as a result, is required to process the content *within these web pages* to produce search results. Thus, the content of the web page (i.e., the embedded meta-tag) is necessary for the search engine to generate a search result. Because the

meta-tags are embedded *within the web pages*, Cheung fails to disclose the elements of “identifying the target objects includes searching for the target objects located in an electronic catalog *separate from the electronic storefront Web site.*” Consequently, in view of these foregoing reasons, Cheung fails to teach or suggest each element of claim 1.

Moreover, Anderson fails to teach or suggest the above missing elements. As an initial matter, the Applicant notes that the Examiner, presumably, has cited U.S. Patent Publication No. 2003/0033292 filed by Meisel et al. (hereinafter “Meisel”) in asserting the rejection of claim 1 (see page 2, item 3 of the Office Action). However, the Applicant believes that this is a typographical error. For the purposes of responding to the Examiner’s rejection, the Applicant will treat the Examiner’s rejection as based on Anderson as evidenced on the first paragraph on page 3 of the Office Action. However, if this conclusion is incorrect and if the Examiner maintains the rejection, the Applicant respectfully requests that the Examiner clarify the rejection of claim 1. Based on this conclusion, the Applicant, again, submits that Anderson fails to teach or suggest the missing elements. The Examiner has not cited and the Applicant is unable to discern the portion of Anderson that teach or suggest the missing elements. Instead, Anderson relates to using embedded hyper-links in a web page to serve as an ad. See Anderson, paragraph [0008]. Therefore, for at least the above reasons, Anderson fails to teach or suggest each element of claim 1.

Thus, in view of at least the reasons set forth above, Cheung in view of Anderson fails to teach or suggest each element of claim 1. In addition, dependent claims 2-20 are patentable over the art of record because each of these claims depends on claim 1. Accordingly, reconsideration and withdrawal of the rejection of claims 1-20 are respectfully requested.

With respect to independent claim 22, this claim, as amended, recites analogous elements to those in claim 1. Therefore, for at least the reasons discussed above in connection with claim 1, Cheung in view of Anderson fails to teach or suggest each element of claim 22. Accordingly, reconsideration and withdrawal of the rejection of claim 22 are respectfully requested.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the prior art of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (408) 720-8300.

Respectfully submitted,

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